

STONE MAGNANINI

COMPLEX LITIGATION

October 14, 2020

VIA ELECTRONIC FILING

The Honorable Jesse M. Furman
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: Joseph Piacentile, M.D., J.D. v. Jeremy Troxel, et. al
Civil Action No.: 1:20-cv-05252-JMF
JOINT STATUS LETTER

Dear Judge Furman:

The Parties are reporting to the Court that they have been actively exchanging information in connection with this case, which includes information in the possession of third parties, with the intent to try to develop an efficient structure to resolve fact issues and preserve the status quo. If this progress continues, the Parties are hopeful they could propose a structure to the Court that would lead to arbitration of the remaining legal disputes. Because of issues encountered in obtaining this information, the process is taking longer than expected.

The Parties respectfully request an additional thirty (30) days to agree upon this structure and present it to the Court. The alternative would be to proceed with motions for expedited discovery and other related motions by the plaintiff, and a motion to compel arbitration by the defendants. Such motion practice would consume extensive time of the Court and the Parties – which could be best spent working on an efficient resolution.

In that regard, the Parties specifically request that:

1. the time for Defendants to respond to, move against, or otherwise answer the Complaint in this action be extended from October 15, 2020 to November 20, 2020;
2. the time for the Parties to submit their Joint Pre-trial order be extended from October 15, 2020 to November 20, 2020; and
3. the time to submit an additional status letter as referenced by the Court in its October 13, 2020 Order be extended from October 15, 2020 to November 16, 2020.

We thank the Court for its many courtesies.

Very Truly Yours,

s/David S. Stone

David S. Stone

Counsel for Plaintiff

s/Ethan Leonard

Ethan Leonard

Counsel for Defendants